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UBER TECHNOLOGIES, INC.  
15 and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,  
20 Plaintiff,  
21 v.  
22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Trial Date: October 2, 2017

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,  
2 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC (“Defendants”)  
3 submit this motion for an order to file under seal the confidential, unredacted version of the  
4 following documents:

- 5 • Portions of Defendants’ Responses to Court-Ordered Interrogatories
- 6 • Exhibit A to Defendants’ Responses to Court-Ordered Interrogatories

7 The redacted portion of the response to interrogatory number 3 of Defendants’ Responses  
8 to Court-Ordered Interrogatories contains technical, proprietary trade secret information, which is  
9 highly confidential. If this information was made public, it could irreparably harm Defendants.  
10 (Declaration of Wendy J. Ray In Support of Defendants’ Administrative Motion to File  
11 Document Under Seal ¶ 2.)

12 Exhibit A is a list of employee names attached to Defendants’ Responses to Court-  
13 Ordered Interrogatories for the purpose of answering Interrogatories No. 1 and 2. Defendants  
14 request this list be kept confidential in order to protect the privacy of individuals at a company  
15 that is currently the subject of extensive media coverage. (*Id.* ¶ 3.)

16 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
17 document at issue, with accompanying chamber copies.

18 Defendants served Waymo with this Administrative Motion to File Document Under Seal  
19 on April 25, 2017.

20 For the foregoing reasons, Defendants request that the Court enter the accompanying  
21 Proposed Order granting Defendants’ Administrative Motion to File Document Under Seal and  
22 designate the service copies of these documents as “HIGHLY CONFIDENTIAL –  
23 ATTORNEYS’ EYES ONLY.”

1 Dated: April 25, 2017

MORRISON & FOERSTER LLP

2  
3 By: /s/Arturo J. González  
ARTURO J. GONZÁLEZ

4 Attorneys for Defendants  
5 UBER TECHNOLOGIES, INC.,  
6 OTTOMOTTO LLC, and OTTO TRUCKING LLC  
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